

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183

---

**MOTION TO EXTEND DEADLINE FOR SUPPLEMENT TO  
EXPERT REPORTS**

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated June 17, 2019 (Doc. 48), the Court set deadlines for expert reports.
2. Pursuant to an Order dated September 11, 2019 (Doc. 50), the Court set a deadline of November 11, 2019 for Defendant to supply its expert reports.
3. The Plaintiff seeks an Order to extend the deadline for supplementary expert reports.
4. The requested extension will not unreasonably delay trial.
5. Defendant concurs in this request.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the deadlines for Plaintiff's supplementary expert reports.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire  
Gerard M. Karam, Esquire  
Bar I.D. # PA 49625  
gmk@mkpvlaw.com

/s/ Christopher J. Szewczyk, Esquire  
Bar I.D. # PA 306689  
cjs@mkpvlaw.com  
Mazzoni, Karam, Petorak, and  
Valvano  
321 Spruce Street  
Suite 201  
Scranton, PA 18503  
P: (570) 348-0776  
F: (570) 348-2755

Date: September 13, 2019

**CERTIFICATE OF CONCURRENCE**

The undersigned hereby certifies that on September 13, 2019, he contacted  
A. James Hailstone, Esquire requesting concurrence in the foregoing motion.  
Attorney Hailstone concurred in the request.

/s/ Christopher J. Szewczyk, Esquire  
Christopher J. Szewczyk, Esquire  
Mazzoni, Karam, Petorak, and  
Valvano  
321 Spruce Street  
Suite 201  
Scranton, PA 18503  
(570) 348-0776

Dated: September 13, 2019

**CERTIFICATE OF SERVICE**

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 13th day of September, 2019.

/s/ Gerard M. Karam, Esquire  
Gerard M. Karam, Esquire